REMARKS/ARGUMENTS

Claims 1-15 are pending in this application. By this Amendment, Applicant AMENDS the specification.

The specification was objected to for allegedly containing a minor informality. Applicant has amended the specification to correct the minor informality noted by the Examiner. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the objection to the specification.

Claims 1, 2, 5, and 8-15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hansen et al. (U.S. 6,411,314) in view of Higgins et al. (U.S. 5,835,627). Claims 3, 4, 6, and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hansen et al. and Higgins et al., and further in view of Shakespeare (U.S. 6,421,575).

Applicant respectfully traverses the rejections of claims 1-15.

Claim 1 recites:

> A job control system for controlling a job in a document processing system in which processing system a number of tasks is performed in a workflow, **the job control system comprising an input source with a user interface for enabling a user to define and change a set of parameters** selected from the group of first parameters for said workflow and second parameters within said workflow, wherein the job control system comprises:
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> an identifier to identify and mark dependencies of results of said job to parameters, wherein said results are selected from the group of intermediate results of said job and final results of said job, and wherein said parameters are selected from the group of parameters for said workflow, parameters within said workflow, and parameters for individual task processors in a production plan defining processing of said job;
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> **a verifier to verify, during job execution, a change in a particular parameter out of said parameters, and to determine if (a) a particular result out of said results and obtained before said change in said particular parameter is independent of said particular parameter**, or (b) if an effect of said change in said particular parameter on said particular result is within a given limit; **so that said particular result is still useable despite said change in said particular parameter**; and
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> **a memory for storing the still useable results**. (emphasis added)

Applicant's claim 10 recites features and method steps that are similar to the

features recited in Applicant's claim 1, including the above-emphasized features.

The Examiner alleged that Hansen et al. teaches all of the features recited in claims 1 and 10 with the exception of a verifier to determine if a particular result is independent of a parameter, or if an effect of a change in a parameter is within a given limit. The Examiner alleged that Higgins et al. teaches a "verifier to determine if (a) a particular result out of said results and obtained before said change in said particular parameter is independent of said particular parameter (Column 23, lines 4-9) … so that said particular result is still useable despite said change in said particular parameter (Column 23, lines 4-58); and storing still useable results [i]n memory (Column 10, lines 8-16)." The Examiner further alleged that it would have been obvious "to combine the teachings of H[a]nson with the teachings of Higgins to yield maximum satisfaction of an image (Column 2, lines 49-67)." See, for example, page 4 of the outstanding Office Action.

Applicant respectfully disagrees for the following reasons.

First, Higgins et al. teaches a process for automatically optimizing the quality of an output image using a modulation transfer function chain 122 and a Wiener noise spectrum chain 123 based on a customer satisfaction index (CSI) (see, for example, column 2, lines 39-45 of Higgins et al.). A characteristic processing section 21 of Higgins et al. includes a parameter optimization element 125 that uses values of the various parameters initially provided to the modulation transfer function chain 122 and the Wiener noise spectrum chain 123, and generates updated parameter values (see, for example, column 23, lines 4-31 of Higgins et al.). The modulation transfer function chain 122 and the Wiener noise spectrum chain 123 operations of Higgins et al. are repeated through a series of iterations using updated parameter values until the parameter optimization element 125 determines that the parameter values meet a termination criterion, in which case the iterations are stopped and the final parameter values are output to the image data processing section 20 (see, for example, column 23, lines 31-50 of Higgins et al.).

The updated parameter values of Higgins et al. are *automatically generated* by

comparison to an updated image quality function value to be used by the parameter optimization element 125 to generate yet another set of parameter values (see, for example, column 23, lines 35-42 of Higgins et al.). That is, any change in the parameter values of Higgins et al. are generated systematically within the characteristic processing section 21 through many iterations based on the CSI to obtain an optimum output image, and not by a change in the parameter values input by a user at a user interface. Consequently, the process disclosed by Higgins et al. is not at all related to determining if a parameter change by a user during job execution changes a result of the job.

Second, Higgins et al. does not remotely teach or suggest a verifier that determines if a particular result, obtained before a change in a particular parameter, is independent of the particular parameter, i.e., that the change in the particular parameter does not change the particular result. Column 23, lines 4-9 of Higgins et al., which the Examiner alleged teaches the above function, merely teaches an image quality function value determination unit 124 and a parameter optimization element 125. The image quality function value determination unit 124 of Higgins et al. merely provides an updated image quality function value based on the CSI to the parameter optimization element 125 (see, for example, column 4, lines 40-43 and column 23, lines 35-42 of Higgins et al.). Accordingly, the image quality function value determination unit 124 and the parameter optimization element 125 of Higgins et al. do not determine if a result, obtained before a change in a particular parameter, is independent of the particular parameter.

Third, Higgins et al. does not remotely teach or suggest storing usable results *during job execution* if a particular result, obtained before a change in a particular parameter, is independent of the particular parameter. None of the parameter values obtained by the modulation transfer function chain 122 and the Wiener noise spectrum chain 123 of Higgins et al. are saved in a memory during the series of iterations. Instead, only the last iteration in which the parameter values meet a termination criterion are output to the image data processing section 20 of Higgins et al. (see, for example,

column 23, lines 31-50 of Higgins et al.). More importantly, Higgins et al. arguably stores the *parameter values* from the last iteration, NOT *usable results* of the job that are obtained with the parameter values.

Thus, the combination of Hansen et al. and Higgins et al. clearly fails to teach or suggest the features of "the job control system comprising an input source with a user interface for enabling a user to define and change a set of parameters," "a verifier to verify, during job execution, a change in a particular parameter out of said parameters, and to determine if (a) a particular result out of said results and obtained before said change in said particular parameter is independent of said particular parameter … so that said particular result is still useable despite said change in said particular parameter," and "a memory for storing the still useable results," as recited in Applicant's claim 1, and similarly in Applicant's claim 10.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection of claims 1 and 10 under 35 U.S.C. § 103(a) as being unpatentable over Hansen et al. in view of Higgins.

The Examiner relied upon Shakespeare to allegedly cure the deficiencies of Hansen et al. and Higgins et al. However, Shakespeare clearly fails to teach or suggest the features of "the job control system comprising an input source with a user interface for enabling a user to define and change a set of parameters," "a verifier to verify, during job execution, a change in a particular parameter out of said parameters, and to determine if (a) a particular result out of said results and obtained before said change in said particular parameter is independent of said particular parameter … so that said particular result is still useable despite said change in said particular parameter," and "a memory for storing the still useable results," as recited in Applicant's claim 1, and similarly in Applicant's claim 10. Thus, Applicant respectfully submits that Shakespeare fails to cure the deficiencies of Hansen et al. and Higgins et al. described above.

Accordingly, Applicant respectfully submits that Hansen et al., Higgins et al., and Shakespeare, applied alone or in combination, fail to teach or suggest the unique combination and arrangement of elements recited in Applicant's claims 1 and 10.

In view of the foregoing remarks, Applicant respectfully submits that claims 1 and 10 are allowable. Claims 2-9 and 11-15 depend upon claims 1 and 10, and are therefore allowable for at least the reasons that claims 1 and 10 are allowable.

In view of the foregoing remarks, Applicant respectfully submits that this application is in condition for allowance. Favorable consideration and prompt allowance are solicited.

The Commissioner is authorized to charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1353.

Respectfully submitted,

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